

PD-1299-16

STATE OF TEXAS
PETITIONER

VS.

KIMBERLY FORD
RESPONDENT

§ IN THE TEXAS COURT FILED
COURT OF CRIMINAL APPEALS
3/2/2017
ABEL ACOSTA, CLERK
§ OF CRIMINAL APPEALS
§
§ TRAVIS COUNTY, TEXAS

UNOPPOSED MOTION TO EXTEND TIME
TO FILE RESPONDENT'S BRIEF

TO THE HONORABLE JUSTICES OF SAID COURT:

Now comes Kimberly Ford, Respondent in the above styled and numbered cause, and moves this Court to grant an extension of time to file Respondent's brief and for good cause shows the following:

1. This case is on appeal from the 13th Court of Appeals where Respondent prevailed as Appellee and the trial court was affirmed in granting a Motion to Suppress Evidence.

2. Petitioner's Brief was filed on February 6, 2017. The deadline for filing the Respondent's brief is March 8, 2017.

3. The request for extension is based on the following facts: The undersigned filed an *Anders* Brief on February 16, 2017 in Cause no. 13-16-00055-CR and is now preparing for a criminal jury trial on March 6, 2017 in Cause no. 16-FC-1031-A.

4. Appellant requests an extension of time of 30 days from the present deadline due to her heavy work schedule.

5. No extension to file the brief has been previously filed. The State of Texas is unopposed to this motion.

6. Defendant is not currently incarcerated.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that this Court grant this Motion To Extend Time to File Respondent's Brief, and for such other and further relief as the Court may deem appropriate.

Respectfully submitted,

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By: /s/ Irma Sanjines

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CERTIFICATE OF CONFERENCE

I have discussed this motion with the Honorable Douglas K. Norman,
Nueces County District Attorney's Office.

/s/ Irma Sanjines
Irma Sanjines

CERTIFICATE OF SERVICE

This is to certify that on March 1, 2017, a true and correct copy of the above and foregoing document was served on the Nueces County District Attorney's Office, by e-file service to douglas.norman@nuecesco.com.

/s/Irma Sanjines
Irma M. Sanjines